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December 4, 2019

Re: United States v. OZ Africa Management GP, LLC,
No. 16-cr-515 (NGG)

Dear Judge Garaufis,

We write on behalf of defendant OZ Africa Management GP, LLC (“OZ Africa”), pursuant to the Court’s Individual Rules II.E. & IV.A., (1) to notify the Court that, having conferred with the Government and counsel for the Claimants, it will be necessary for OZ Africa to seek the Court’s assistance in ordering certain discovery relating to the issue of restitution; and (2) to request, with the consent of the Government and the Claimants’ counsel, that the Court set a schedule for briefing on the discovery issue and a control date for subsequent substantive briefing by OZ Africa.

Specifically, we request that we be permitted to apply for Court-ordered discovery by December 9, 2019, that the Government and Claimants be permitted to submit opposition papers by December 17, 2019, and that we be permitted a brief reply by December 20, 2019. The Government and Claimants have consented to this schedule.

We further request, with the consent of the Government and Claimants, that a control date of January 23, 2020 be set for OZ Africa’s substantive brief in response to the Court’s August 29, 2019 Order, along with any supporting exhibits. As discussed with the Government and Claimants, given the proximity to the winter holidays, should it be necessary to allow the Court to rule on the discovery issues and permit the defense to receive and make effective use of discovery, we will ask the Court to adjust the January 23 date at the appropriate time.

Respectfully submitted,

/s/ Anirudh Bansal
Anirudh Bansal
Charles A. Gilman

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court for the Eastern District of New York
United States Courthouse, Room 1426 S
225 Cadman Plaza East
Brooklyn, New York 11201

cc: All Counsel of Record via ECF